

5. STATUTORY FRAMEWORK

5.1. National Policy Statements

There are currently ten National Policy Statements being:

- National Policy Statement for Electricity Networks
- National Policy Statement for Renewable Electricity Generation
- New Zealand Coastal Policy Statement
- National Policy Statement for Freshwater Management 2020
- National Policy Statement on Urban Development
- National Policy Statement for Highly Productive Land
- National Policy Statement for Indigenous Biodiversity
- National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat
- National Policy Statement for Natural Hazards 2025
- National Policy Statement for Infrastructure 2025

The relevant National Policy Statements for this submission are National Policy Statement for Urban Development, National Policy Statement for Electricity Networks, National Policy Statement for Freshwater management, National Policy Statement for Natural Hazards, National Policy Statement for Infrastructure 2025, National Policy Statement for Highly Productive Land and National Policy Statement for Indigenous Biodiversity. These matters are addressed below.

5.1.1. National Policy Statement for Urban Development (NPS-UD)

The National Policy Statement on Urban Development (NPS-UD) recognises the national significance of having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future, and to provide sufficient development capacity to meet the different needs of people and communities.

The NPS-UD is relevant to Mangakino, although a small rural community.. Objective 2 of the NPS-UD is key because it recognises That Planning decisions improve housing affordability by supporting competitive land and development markets. Policy 2 support this objective.

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets

Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

As demonstrated in the Formative Limited Economic Assessment (Appendix 7), this rezoning submission proposal supports Objective 2 and Policy 2 of NPS-UD whereby it will provide sufficient land to meet expected demand for housing over the next 30 years. The economic assessment is summarised as follows:

Given the expected growth trajectory and the relatively limited remaining supply in Mangakino, it is likely that both 57 Lake Road and Karamū Street will need to be brought

forward for development. At a projected growth rate of approximately 7-10 dwellings per annum and an estimated remaining capacity of around 25 lots, existing capacity would be exhausted within the next 2–3 years.

This indicates a potential shortfall emerging in the short term, likely around 2028-2029. On that basis, there appears to be a clear need for additional zoned land to ensure supply remains aligned with demand. Accordingly, rezoning via PC44 of at least 57 Lake Road should be progressed now as a minimum response to address the anticipated capacity constraint. We also consider that rezoning Karamū Street would be beneficial, as it would help ensure an adequate supply of residential capacity and provide additional flexibility to respond to demand.

The proposal to rezone both sites as General Residential will meet the obligation to provide a well-functioning environment in Mangakino through increasing the diversity of greenfield and infill housing, in location adjoining existing residential areas where services are able to be provided and which will support the surrounding rural industries. The provision of new greenfield development will support a competitive real estate market in Mangakino, in a location able to be designed as resilient to climate change. As such the proposal is in keeping with the Objectives and Policies of NPS-UD.

5.1.2. National Policy Statement for Electricity Networks (NPS-EN)

The National Policy Statement for Electricity Networks (NPS-EN) had recent amendments which came into effect on 15 January 2026 and apply to all electricity transmission and distribution networks. The Objective of NPS-EN is to provide for the national significance of the electricity network.

This proposal does not impact on the ability of the electricity network to provide for present and future generations, nor the ability of the network to be upgraded and improved. None of the land proposed to be rezoned has significant powerlines on it.

The Lines Company have confirmed the ability to service the future subdivisions on the sites, and the rezoning does not affect the hydroelectric capacity or operations of Lake Maraetai by Mercury Energy. Sufficient area is available on both sites for Electricity Distribution Network assets where needed, and sufficient buffers can be provided on both sites to avoid buildings impacting on the Electricity Distribution Network. As such the proposal is in keeping with the Objective and Policies of NPS-EN.

5.1.3. The National Policy Statement on Freshwater Management 2020 (NPS-FW)

The National Policy Statement for Freshwater Management (NPS-FW) manages freshwater in a manner that gives effect to the fundamental concept of Te Mana o te Wai which refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community.

Neither site has identified wetlands, or streams. The proposed subdivision rules (SUB-R1.x and SUB-R8.x) direct consideration to current assessment criteria which specifically reference 'the potential adverse cumulative effects of the subdivision or subsequent land use on the quality of Taupō District's lakes, waterways and aquifers, and the methods by which such effects can be avoided, remedied or mitigated.' Of consideration is the discharge of road stormwater from future roads. A number of stormwater methodologies may need to be employed on either site as a result of geotechnical considerations. However, there is sufficient area on each site for these solutions, and no limitation on either site to the ability to meet Taupō's Code of Practice and Waikato Regional Council stormwater requirements (and by association the conditions of Taupo District Council's stormwater discharge consent for Mangakino). Likewise, the wastewater treatment plant for Mangakino is currently being reconsented and will be upgraded to provide for growth in Mangakino. As such the proposal is in keeping with the Objectives and Policies of NPS-FW.

5.1.4. National Policy Statement for Natural Hazards 2025

The National Policy Statement for Natural Hazards (NPS-NH) seeks to manage natural hazard risk using a risk based proportionate approach. The sites are not identified in the District Plan as being within an Erosion Hazard Area, Flood Hazard Area, Hot Ground Hazard Area, or Landslide Hazard Area, nor is it located on or near a fault line.

The CMW Geoscience Geotechnical Reports (Appendix x) have identified areas of uncontrolled fill, slope creep and slope instability within Lake Road. No such hazards are identified at Karamū Street. The Geotechnical Reports undertaken for the two sites demonstrates that the proposal has been appropriately evaluated in accordance with the risk based framework required by Policy 1.

This proposed plan change submission incorporates proportionate mitigation and design responses in the proposed rules and assigned assessment criteria. These include rules requiring site specific engineering and servicing analysis and measures that address the identified risks without imposing unnecessary or excessive constraints. Accordingly, the proposal is consistent with the proportionate management approach anticipated by Policy 2.

With the implementation of the recommendations via the use of existing assessment criteria in the subdivision process, the future residential use of the sites will not be subject to high or very high geological natural hazard risk. As such, the proposal avoids inappropriate development in hazard prone areas and is consistent with Policy 3.

The primary hazard risk on the Lake Road site is slope instability on the cliff edge, and uncontrolled fill. With the application of the setback recommendations, no adjoining land is affected. The proposal therefore does not increase significant natural hazard risk beyond the site and is consistent with Policy 4.

The assessments undertaken rely on site specific geotechnical investigations, stormwater modelling, and District Plan hazard mapping, representing the best available information for the site. The proposal therefore satisfies the requirements of Policy 5.

Future stormwater modelling will be required by Taupō Code of Practice, NZ4404 and best practice to take into account climate change adjusted runoff assumptions, ensuring that long term changes in rainfall intensity and frequency have been appropriately accounted for. The proposal is therefore consistent with Policy 6.

Overall, the proposal has a low/medium level of natural hazard risk, incorporates proportionate and effective mitigation measures, does not increase risk to other sites, and has been assessed using the best available information, including climate change considerations. The proposal is therefore consistent with the NPS-NH.

5.1.5. The National Policy Statement for Infrastructure

The National Policy Statement for Infrastructure (NPS-I) applies to all infrastructure activities. NPS-I seeks to ensure the benefits of infrastructure are provided for, enabling infrastructure to support community wellbeing and support to the development and change of urban and rural environments to meet their changing needs. It also seeks to ensure infrastructure is well functioning, resilient and compatible with other activities.

Infrastructure internal to the proposal areas will be developed in accordance with Waikato Regional and Taupō Council requirements. Through discussions with Council's wastewater asset Manager, the upgrade to the Mangakino Wastewater Treatment Plant includes an high levels of treatment in and additional capacity for the long term growth in Mangakino. Water supply capacity is not impacted by this proposal and existing roads are suitable for the additional capacity. The proposal is consistent with NPS-I.

5.1.6. The National Policy Statement for Highly Productive Land

The National Policy Statement for Highly Productive Land (NPS-HPL) applies to subdivision and land use applications where located on LUC 1, 2 & 3 soils. In this area, detailed mapping has not been undertaken by WRC, nor has the RPS or Regional Plan been updated therefore the Manaaki Whenua Landcare Research/NZLRI mapping is relied on (Image 2).



Image 2: Manaaki Whenua Mapping

The 1st Edition of Manaaki Whenua mapping was undertaken between 1973 and 1980, subsequent mapping was undertaken between 1980 and 1984. Importantly at this time, Lake Road and Karamū Street were either utilised as urban land or in the process of being decommissioned as residential and industrial land, therefore the Manaaki Whenua mapping does not have LUC mapping for these sites.

To provide confidence to the Council, WMI have commissioned Landvision Ltd to undertake site specific mapping (Image 3 below) and assessments of the sites (Appendix 8). The Lake Road site is LUC 3 & 6. The Karamū Street site is shown to be surrounded by LUC 3 land. Although detailed LUC mapping is not provided for this site, given its close proximity to the surrounding LUC 3 land, its flat topography and known free draining attributes, for the purposes of this submission it is assumed to be LUC 3. There is no LUC 1 or 2 land in the area.

However, technically the sites are not LUC 1, 2 or 3 land because that term is defined as follows:

LUC 1, 2, or 3 land means land identified as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory, or by any more detailed mapping in place at the commencement date that uses the Land Use Capability classification.

The commencement date was 17 October 2022 and as at that date there was no LUC assessment which classified the land as 1, 2 or 3. Likewise, the sites do not meet the definition of highly productive land, as it has not been mapped in accordance with the NPS, nor included in the regional policy statement.



Image 3: Landvision Mapping

Under amendments to NPS-HPL undertaken in late 2025, Clause 3.6(1) to 3.6(4) do not apply to urban rezoning of LUC 3 land. Clause 3.6(5) continues to apply. It states:

Territorial authorities must take measures to ensure that the spatial extent of any urban zone covering highly productive land is the minimum necessary to provide the required development capacity while achieving a well-functioning urban environment.

As noted above in 5.1.1 above, the proposal to rezone 17.603ha of rural land which is mostly LUC 3 is necessary for the future residential demand in Mangakino. Rezoning these smaller parcels adjoining existing residential areas assists to protect larger more productive rural parcels to be retained for rural purposes. This proposal is therefore consistent with NPS-HPL.

5.1.7. The National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity (NPS-IB) applies to indigenous biodiversity in the terrestrial environment throughout Aotearoa New Zealand.

Very little indigenous biodiversity occurs on either site. There is vegetation on the northern boundary between the site and the lake edge. Clause 3.16 of NPS-IB specifies that:

If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy.

Native revegetation may occur in areas of reserve or lake edge of the site following geotechnical advice and stormwater assessment and design.

5.2. National Planning Standards

The proposed rules and development plan are in accordance with National Planning Standards.

5.3. Waikato Regional Policy Statement

The Waikato Regional Policy Statement (RPS) is a high-level, broad-based document containing objectives and policies the purpose of which is to provide an overview of the resource management issues of the region and to achieve integrated management of the natural and physical resources of the Region.

WRPS Plan Change 1 was notified on 18 October 2022. The hearing was held on 8 and 9 May 2023, and was adjourned until 23 May 2023. Decisions were publicly notified on 15 November 2023, and are still subject to appeal. This plan change incorporates the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD). The plan change deletes the specific provisions relating to growth strategies prepared by territorial authorities outside of the Future Proof subregion (ie Taupō 2050). These have been replaced with generic provisions to guide preparation of, and give weight to, growth strategies.

More weighting should be applied to the Plan Change 1 than the operative RPS because it has proceeded through to the decisions stage of the statutory process, and the operative RPS is out of date with the current statutory requirements.

5.3.1. Vision and Strategy for the Waikato River – Te Ture Whaimana o Te Awa o Waikato

Under s11 of the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and s12 of the Ngati Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010, the Vision and Strategy (V&S) is deemed to be part of the Waikato Regional Policy Statement. Under s104(1)(b), the Waikato Regional Council must “have regard to” the RPS when considering any application for resource consent. However, additionally, the river settlement legislation also requires that the Waikato Regional Council must have “particular regard” to the Vision and Strategy for the Waikato River when carrying out any of its functions under RMA 1991. Through case law, the V&S is acknowledged as the primary, direction-setting policy for the Waikato Awa River. Case law indicates that activities which are subject to the V&S are required to provide for the protection and restoration of the River, and that this will require “betterment” to an extent proportionate with the scale of the activity and its effects.

The guiding Vision and Strategy is for a future where a healthy Waikato River sustains abundant life and prosperous communities. All people are responsible for restoring and protecting the river's health for generations to come. To achieve this vision, the strategy focuses on the following objectives – Water Quality, Integrated Management, Holistic Health, Cultural Significance, Public Access. The Waikato and Waipā Rivier Restoration Strategy acts as an action plan for actions in erosion control, water quality, biodiversity and cultural values.

The proposal converts (again) the sites from pasture to urban use. This conversion will remove rural activities (namely cattle grazing) from these locations, in particular the Lake Road site close to Lake Maraetai. This conversion removes stock nutrients from these locations, enabling the treatment of wastewater to occur in the Mangakino Wastewater Treatment Plant and stormwater treatment to occur in accordance with Waikato Regional Plan guidelines. The Mangakino Wastewater Treatment Plant is due to be upgraded to high levels of treatment in accordance with Waikato Regional Council discharge consent conditions, and to provide capacity for the long term growth in Mangakino. Notably the consent for that Mangakino Wastewater Treatment Plant is being renewed in light of the Vision and Strategy and must be consistent with it. The development will also enable the consideration of stormwater reserves connecting to Lake Maraetai whereby planting may occur in these reserves enabling an improvement in ecological values.

5.3.2. Waikato Regional Policy Statement - Objectives and Policies (amended by Plan Change 1)

Key issues of Waikato Regional Policy Statement that the proposal addresses are the state of resources (SRMR-I1), managing the built environment (SRMR-PR4), relationship of tangata whenua with the environment (SRMR-I5), and Health and wellbeing of the Waikato River Catchment (SRMR-I6).

Objectives

There are a number of overlapping objectives under each of these relevant to this proposal.

In relation to the Integrated Management objectives (IM-O1, IM-O2), the proposal has assessments confirming that environmental effects, including transport and contamination, are limited and can be appropriately managed. The development also provides for sustainable use of land to support housing demand utilising existing infrastructure, contributing to social and economic wellbeing while maintaining environmental safeguards.

The proposal is consistent with IM-O5 (Climate Change), as development is able to be undertaken in a staged and planned manner, enabling future design to incorporate resilience. Development occurring adjacent to the existing Mangakino area provides the ability to support reductions in emissions through the potential for future improved connectivity and potential active transport links. The sites are in locations clear of the impacts of flooding and sea level rise.

The proposal is consistent with IM-O6 (Ecosystem Services) as the site has low to no ecological values, and opportunities exist to enhance ecological values through planting and design.

Consultation has been undertaken with tangata whenua with no specific requests being made on the proposal with the exception of practices relating to soil contamination remediation. WMI has Tangata Whenua and Mana Whenua rights and are Katikati and have Mana Whakahaere status over their lands in the Mangakino District and the Mangakino Township. Development of the site will be undertaken in accordance with WMI values, consistent with IM-O7 (Tangata Whenua Relationships).

The sites both adjoining Mangakino's residential areas and were once part of the Mangakino Township. A key characteristic of the Lake Road site, is its Lake Maraetai edge, views and values. The development of the site will be undertaken as the market and community needs, while maintaining overall amenity through normal residential design and appropriate servicing, consistent with IM-O9 (Amenity Values).

The site is highly modified and does not contain any indigenous biodiversity. There is opportunity for the edge planting within the Waikato River corridor to be enhanced in time, meaning ecological integrity is maintained, consistent with ECO-O1 (Ecological Integrity).

The proposal provides for integrated and planned urban development, consistent with UFD-O1 (Built Environment), notably being already included in Taupō Future Development Strategy. The proposal adjoins existing residential areas and is able to be fully serviced with water, wastewater and stormwater services. It aligns land use with infrastructure capacity through the potential for staging, supports housing supply, and recognises the need to integrate transport, water, and servicing. It also contributes to a well-functioning urban environment by providing housing choice through greenfield development in Mangakino where supply is required, seeking to meet the aspirations of WMI for urban development. The use of this particular greenfield land to achieve these outcomes, avoids for now the use of more productive urban land surrounding Mangakino for urban use.

Policies

The key objectives are achieved through a range of policies in the RPS. Those of most relevance to this particular proposal have been listed below:

The proposal is consistent with ECO-P1, as it avoids adverse effects on significant indigenous biodiversity and enables opportunities for enhancement adjoining the Waikato River. Development can occur on the sites with low impact on amenity values of the Waikato River.

The proposal is consistent with UFD-P1 and UFD-P2, as development is planned and coordinated with infrastructure, with staging abilities, ensuring servicing upgrades keep pace with growth. Critically the Mangakino Wastewater Treatment Plant is in the process of being re-consented by Waikato Regional Council. This re-consenting will include the additional discharge volume necessary for this proposal. Although delayed by recent changes in both the extension to the expiry date of the expired consent to 31 December 2027, and the new Wastewater Environmental Performance Standards, the Taupō's Long Term Plan 2024 continues to include funding for this upgrade which will occur in sufficient time for connection by the proposed sites, at the 7-10 lot rate of development.

The proposal is consistent with UFD-P18, being consistent with Taupō's Future Development Strategy, is required to meet the development demand specifically assessed for Mangakino, focuses development adjacent to an existing settlement, avoids dispersed rural subdivision, and confirmed by Council to be supported by existing (and upgraded) infrastructure. It will enable a future diversity of housing types and maintains an efficient urban form in line with RPS Appendix 11 (Appendix 10). Finally, the proposal is consistent with UFD-P19, as it is not an out of sequence growth area in Mangakino, adjoining the existing residential area, not being contrary to infrastructure planning or environmental outcomes.

Overall, the proposal is consistent with the relevant Waikato RPS objectives and policies (as amended by Plan Change 1), representing urban expansion that is serviced, consideration of the Waikato awa values, integrated, and efficient, that seeks to answer Mangakino's development needs with environmental and cultural considerations.

5.4. Iwi Management Plans

The sites are located within the areas of interest for Ngāti Tūwharetoa and Raukawa. The Lake Road Site adjoins the Waikato Awa Statutory Acknowledgement Area for Ngāti Tūwharetoa and Raukawa.

Ngāti Tūwharetoa Iwi Management Plan

The Ngāti Tūwharetoa Environmental Iwi Management Plan provides a background to and identifies key resource based issues for Ngāti Tūwharetoa. The vision of the management plan is for Ngāti Tūwharetoa to 'assert their custodial and customary right of tino rangatiratanga over their respective taonga, and Tūwharetoa collectively, will sustain and protect the life force of all tribal and inherited taonga.'

As the sites are within an existing modified rural area, adjoining an existing urban area, with no waterbodies, no identified waahi tapu, waahi taonga sites, in terms of the relevant chapters *Papatūānuku*, and *Ngā Wāhi Tapu*, it is considered that the proposal is not inconsistent with those policies and is consistent with this iwi management plan.

Raukawa Environmental Management Plan 2015

Te Rautaki Taiao a Raukawa is a statement of Raukawa issues, aspirations, and priorities in relation to the environment.

The proposal is consistent with Te Rautaki Taiao a Raukawa in that the proposal provide for connection to a wastewater treatment plant, treatment of stormwater where needed, connection to Lake Maraetai is possible, enables the removal of stock from close proximity to the river, no wetlands are affected, no sites of significance are impacted, the proposal enables more modern housing in the area providing housing for rural workers in a location largely clear of natural hazards,

Generally, the proposal is consistent with the relevant objectives.

Further assessment of any effects on cultural and archaeological values is undertaken in Section 8.4.

5.5. Regional Plans

Any development within the Mangakino Development Area will need to meet with the requirements of the Waikato Regional Plan, including for any matters associated with land development including earthworks and subsequent discharges (including stormwater and wastewater), air quality, excavation. It is expected that any development would discharge wastewater and stormwater via the Taupo District Council reticulated network and pursuant to those resource consents.

5.6. Taupō District Future Development Strategy

The Waikato Regional Policy Statement UFD-P18 recognises new urban development be undertaken in accordance with a growth strategy for the Taupō District.

Taupō's Future Development Strategy has been developed in accordance with National Policy Statement for Urban Development and replaces the former growth management strategy TD2050. It is the third growth strategy for the district. TD2050 was adopted in 2006 and updated in 2018 (which is referenced in the Taupō District Plan). The FDS uses population projections to identify how many additional people will call the district home over the period to 2060 and how many homes and business land are required to accommodate these people. Taupō's FDS identifies the district's residential, retail, commercial and industrial growth needs and the constraints it faces to meet anticipated growth. It provides guidance on where development and growth are anticipated to occur. It considers risk and helps Council to plan for infrastructure and gives the community and landowners certainty over where development is expected to be located and when.

The FDS implementation plan identifies two actions that relate to the residential chapters –

1. *Review the Residential Chapters of the District Plan to ensure that they enable different typologies and allow for intensification. Public transport routes are to be taken into account when considering intensification provisions.*
2. *Each time we review the Residential Chapters of the District Plan, undertake an assessment to determine whether future growth areas need to be rezoned.*



Image 4: FDS Mapping

The eight outcomes of the FDS relate to the ongoing management of growth:

1. A district characterised by contained urban communities, bordered by a productive, functional rural environment.
2. A strong, innovative and productive economy that provides opportunities for our people to thrive.
3. Vibrant, diverse places and spaces where people thrive and love to live, work and play.
4. Compact walking and cycling friendly urban areas where communities are connected.
5. Urban form in the Taupō District is closely aligned with Tāngata whenua values and aspirations.
6. Infrastructure provision is efficient and effective helping to minimise costs for our communities.
7. Development is managed to protect and enhance the natural environment.
8. Urban areas will be resilient to the impacts of natural hazards and the effects of climate change.

The FDS is not embedded into the District Plan. Rather the FDS Implementation Plan outlines that on review of growth data on a three yearly cycle via a Housing and Business Assessment (HBA) may then result in additional residential growth areas being proposed for rezoning via a District Plan Change. It may result also in additional residential growth areas being identified for inclusion in the next FDS. Similarly, the intensification provisions of the District Plan will also be reviewed.

Taupō District Council's Future Development Strategy (FDS) provides clear support for additional residential growth in Mangakino, although at a smaller scale than Taupō township or Kinloch. The strategy recognises Mangakino as a settlement where both infill and greenfield residential development will be required over the next 30–35 years to meet future housing demand. Mangakino is specifically identified as an area where “modest growth” is anticipated.

Importantly, the FDS expressly anticipates both infill and greenfield residential development in Mangakino to accommodate approximately 150 additional homes. While Mangakino is expected to experience smaller-scale growth, the strategy nonetheless recognises the need for additional residential capacity and future urban development opportunities within the settlement.

5.7. Relevant Strategies

5.7.1. Taupō District Council Vision and Community Outcomes

Taupō District Council's Vision is: *We will be a district of connected communities who thrive and embrace opportunities.*

Community Outcomes to achieve this vision are stated as

- Tangata whenua are acknowledged and respected
- Vibrant places and connected communities
- Resilient communities working in partnership
- Innovative, thriving economy
- Flourishing environment

The proposal seeks to both create a vibrant Mangakino and contribute to a thriving economy whilst managing effects to the environment.

5.7.2. Taupō District Council Housing Strategy

Taupō's Housing Strategy identifies the key housing issues and opportunities in the Taupō District, provides a framework to address them, and sets out what Council's role should be.

The housing strategy contains 4 goals:

- 1) More availability and choice of housing.
- 2) Homes are warm, healthy, sustainable, and resilient.
- 3) Our homes meet the diverse needs of our communities.
- 4) Housing connects and integrates communities.

This proposal contributes to achieving these goals in a number of ways. The proposal enables more availability of housing by creating more lots, and varying lot sizes provides for a choice of housing. New homes are warm, healthy, sustainable and resilient. Future homes on varying lot sizes can meet the diverse needs of communities. The proposal will provide road connection and can provide walk/cycle path connections. Accordingly, the proposal is considered to be consistent with the Housing Strategy.

5.7.3. Climate Change Strategy & Transport Strategy

Taupō's Climate Change Strategy seeks to reduce greenhouse gas emissions through improving walk and cycling networks, electric buses, supporting public transport networks, native revegetation programme.

Taupō District Council's Transport Strategy provides strategic support for planned residential growth across the district, including settlements such as Mangakino, by promoting coordinated land use and transport planning, infrastructure resilience, accessibility, and safe movement networks. That is, future urban growth must be integrated with transport planning to avoid inefficient or unplanned development patterns.

The relevance of the Transport Strategy for this proposal is its outcomes of local road connectivity, walkability, access to services and recreation, and the ability of the local transport network to accommodate modest residential growth. Residential growth in Mangakino that is contiguous with existing urban area is likely to be more efficient from a transport servicing perspective than isolated rural development as it will achieve transport efficiency, accessibility, and infrastructure integration.

Mangakino is a small rural community, readily bikeable and walkable. Its isolation from other communities and the distances to get to community and health services and workplaces is problematic. Public transport or other methods as carpooling will be more viable with an increase in population in Mangakino, which this rezoning may achieve. The Lake Road location is adjoining the Waikato River Trail providing ease of access to this cycle trail.

5.7.4. Stormwater Strategy

Taupō District Council's Stormwater Strategy supports a coordinated and infrastructure-led approach to urban growth, with a strong emphasis on managing flooding risk, protecting receiving environments, and integrating stormwater planning with future land development in urban areas.

For this proposal, the land is not subject to significant flood hazards and can accommodate appropriate stormwater design, aligning with the strategy's objectives. Furthermore the proposal has sufficient area to incorporate modern stormwater design measures such as detention, attenuation, treatment devices, low-impact design, and appropriate earthworks controls when geotechnical considerations are applied.

5.8. National Environmental Standards

There are currently the following National Environmental Standards:

- National Environmental Standards for Air Quality
- National Environmental Standards for Sources of Human Drinking Water
- National Environmental Standards for Telecommunication Facilities
- National Environmental Standards for Electricity Transmission and Electric Vehicle Charging Infrastructure Activities
- National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health
- National Environmental Standards for Commercial Forestry
- National Environmental Standards for Freshwater
- National Environmental Standard for Marine Aquaculture
- National Environmental Standard for Storing Tyres Outdoors
- National Environmental Standard for Greenhouse Gases from Industrial Process Heat
- National Environmental Standard for Detached Minor Residential Units

The relevant National Environmental Standards are National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-SCS).

5.8.1. National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect the Human Health (NESCS)

The National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect the Human Health (NESCS) is considered relevant to this proposal as Lake Road is identified as a Piece of Land. As a plan change, the proposal is a change in use of a piece of land. The future subdivision will eventually involve disturbing soil of a piece of land.

WMI have commissioned Geohazards Environmental Limited to undertake both a Preliminary Site Investigation (PSI) and a Detailed Site Investigation (DSI) for both sites (Appendix x).

These investigations conclude that the Karamū Street site is suitable for residential use without remediation. Lake Road site has areas where contamination is present at the site at 37 Lake Road at levels that are in excess of relevant soil guideline values for some purposes. This contamination is associated with the historic timber mill activity on the site. The soil testing results and conclusions are in the Geohazard Environmental Assessment, where a range of contaminants were found to exceed both background concentrations and residential guidelines. The extent of this contamination is on page 77 of Geohazard's report and shown again in Image 5 below.

Geohazard's advice is that a Remediation Action Plan/Site Management Plan is recommended for residential use of the site. This will include additional soil sampling to delineate the horizontal and vertical extent of any contamination. Remediation or Site Management options include a variety of measures based on the different contaminants including excavation and offsite disposal, onsite encapsulation, soil mixing, or some combination. There are no technical limitations for remediation to be successful at the site. Limitations will mostly be driven by cost and any desire to have titles clear of any site management requirements.



Image 5: Geohazard Mapping of Contaminants

Given the above, the site is considered a 'piece of land' under the NESCS and therefore future consents will be required at time of subdivision to require a remediation action plan for the development of these sites. This NESCS process is well known to Council and will be easily incorporated into the subdivision process. The remediation requirements may also influence any staging of the subdivision once more investigation as recommended by Geohazards is undertaken, and costs known.

6. ASSESSMENT AGAINST CRITERIA IN SECTION 32 REPORT

Plan Change 44 Section 32 Section 8.2 outlines a set of criteria for urban development to be successfully considered for residential development. The Section 32 focusses on Low Density Residential development provision however it is used here to demonstrate that this proposal largely meets these criteria also.

6.1. Location Relative to Existing LRZ or GRZ/Consistent Existing Development Pattern

Mangakino was developed with traditional lot sizes, largely single storey modest dwellings. The streets closest to the lake frontage have larger single storey dwellings with areas of more recent development. There are very little infill development. The centre of Mangakino has a small retail area, Council service area, community services near the school. Reserves adjoin the lake.

The subject sites are located immediately adjacent to existing General Residential land and forms a logical continuation of established urban development. Rezoning would therefore be a small yet logical extension of the urban area. Undertaking development adjoining Mangakino avoids pressure

on the surrounding rural area, yet will provide housing for a variety of purposes including for rural industry workers, aligning with the intent of PC44.



Image 6: Lake Road



Image 7: Karamū Street

6.2. Infrastructure Servicing – Council Water & Wastewater Supply

Council's Water Asset Manager has advised that there is sufficient capacity within the Mangakino Water Supply without any upgrades.

Council's Wastewater Asset Manager has advised that the Mangakino Wastewater Treatment Plant is in the process of being re-consented by Waikato Regional Council. Critically the Mangakino Wastewater Treatment Plant is in the process of being re-consented by Waikato Regional Council. This re-consenting will include both upgrade in treatment and the additional discharge volume necessary for this proposal. Although delayed by recent changes in both the extension to the expiry date of the expired consent to 31 December 2027, and the new Wastewater Environmental Performance Standards, the Taupō's Long Term Plan 2024 continues to include funding for the upgrade to the Wastewater Treatment Plant which will occur in sufficient time for connection by the proposed sites, at the 7-10 lot rate of development.

These outcomes in combination with the proposal are consistent with the Taupō District Future Development Strategy (FDS), which emphasises coordinated growth in locations able to be serviced efficiently.

6.3. Land Transport Effects

The development of allotments enabled by the proposed General Residential zoning would not result in more than minor adverse effects on the supporting land transport network. Mangakino's road network was constructed for a larger population, therefore is sufficient for the additional traffic occurring from the proposal. Access is gained from local roads, not from State Highways. Any site-specific roading or intersection upgrades can be appropriately addressed at the subdivision stage, meeting PC44's effects-based approach to managing transport impacts.

6.4. Outstanding Natural Landscape and Significant Natural Areas

Neither site is identified as an Outstanding Natural Landscape nor as a Significant Natural Area in the Taupō District Plan (Image 8). The Lake Road site is adjacent to but not in the Waikato Outstanding Natural Landscape (ONL56). The proposal therefore avoid adverse effects on nationally or regionally significant landscapes or ecological areas, and be consistent with the environmental limits recognised in PC44 and higher-order planning documents.



Image 8: Lake Road Site and Outstanding Natural Features and Landscapes Overlay

6.5. Proximity to Mangakino Township

The sites adjoin Mangakino, adjoining existing GRZ land, meaning the proposal will expand an existing urban area. Any future residents will have access to three waters reticulation, walking/biking trails, school and the small shopping/service centre. The growth in housing may enable growth in population creating better viability for employment, transport, education, services, and community facilities. This proximity meets Outcomes 3, 4, 6 & 7 of the FDS.

6.6. Access from State Highway

The site does not take direct access from a State Highway, only from local roads. Accordingly, the proposal would avoid reverse sensitivity effects on state highway infrastructure and align with district-wide objectives relating to the safe and efficient functioning of nationally significant infrastructure. The close proximity of State Highway 30 is noted with well-designed intersections of Lake Road to State Highway 30 which have been designed for much larger traffic volumes than now occur on these roads.

6.7. Geothermal Systems

The land is not located within the Wairakei Tauhara or Ōhāaki Geothermal Systems shown on Map D1. There are therefore no geothermal constraints that would preclude General Residential zoning.

6.8. Natural Hazard Risk

The land can be demonstrated to be free of significant natural hazard risk.
Any localised or site specific hazard considerations can be:

- Identified through LIM and PIM processes, and
- Appropriately managed at subdivision and building consent stages, consistent with the National Policy Statement for Natural Hazards and Council's risk based planning approach.

6.9. Consistency with Higher Order Planning Documents

The proposal is consistent with:

- National Policy Statement on Urban Development – enabling housing supply and well-functioning urban environments,
- Waikato Regional Policy Statement – integrated growth and infrastructure coordination,
- Taupō District Future Development Strategy – recognition of ongoing demand for density residential housing, and
- Proposed Plan Change 44 objectives relating to housing supply, choice, and efficient urban form.

7. SECTION 32 STATUTORY FRAMEWORK

7.1. Legislative Requirements

Section 32 of the RMA requires that before giving effect to a proposed plan change, an evaluation must be undertaken to:

- Examine whether the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA; and
- Examine whether the provisions are the most appropriate way to achieve those objectives, including:
 - Identifying reasonably practicable alternatives,
 - Assessing efficiency and effectiveness, and
 - Summarising reasons for the preferred option.

In accordance with section 32(1)(c), the level of detail contained in this evaluation reflects the scale and significance of the anticipated environmental, economic, social and cultural effects.

The proposal is an amending proposal under section 32(3), as it seeks amendment to the proposed Plan Change only. Section 32(6) clarifies that where no actual objectives are stated in the proposal, the objective is the purpose of the proposal.

7.2. Identification of the Issue

The core issue is the sufficiency of housing opportunities in Mangakino. There is limited vacant residential zoned land in Mangakino. The identified need in the FDS for Residential capacity within Mangakino, as well as the capacity within the water, wastewater and roading infrastructure to accommodate more residential lots requires the consideration of more land for residential use. Therefore to achieve more greenfield housing, the General Rural Zone is not the most appropriate zoning for the sites.

As the only landowner of rural land on the edge of Mangakino, WMI have identified and assessed these two sites are most suitable for residential development due to their:

- historical use as urban activities
- inefficient size and location for rural productivity
- location on the edge of the Mangakino Township and
- freehold title status

which make them ideal for residential development.

Therefore the General Residential zone is considered more appropriate for 35 Lake Road and 3 Karamū Street than the present rural zoning as it provides for a range of future lot sizes to meet the housing need.

7.3. Taupō District Plan Objectives

This proposal does not seek to amend any Objective or Policy, accordingly the s32A tests for the proposal and amendments to the subdivision rules is whether the proposal is appropriate to achieve the existing objectives and implementing the policies.

The Strategic Directions and Objectives & Policies of the Taupō District Plan are assessed below.

7.3.1. Strategic Direction - Climate Change

Section 6.1 of the Plan contains the strategic Climate Change policy framework. The relevant provisions seek positive climate change outcomes (CC-O1), resilience to current and future effects of climate change (CC-O2), and adapt to the risks and effects from climate change (CC-O3).

The proposed rezoning of approximately 17.6ha of rural land for residential development in Mangakino is generally consistent with Objective CC-O1 because it facilitates planned and consolidated urban growth adjacent to an existing settlement rather than dispersed rural development. Concentrating growth within or adjoining the existing urban area can support more efficient infrastructure provision, support public transport and viability of services and community facilities. The proposal also aligns with Council's Future Development Strategy, which anticipates additional residential growth in Mangakino through both infill and greenfield development.

At the subdivision and development stages, opportunities exist to incorporate climate-responsive urban design measures such as efficient stormwater systems, low-impact design, water-sensitive

design, and energy-efficient housing outcomes, which would further support positive climate change outcomes. The conversion from pastoral farming removes ongoing agricultural greenhouse gas emissions, including methane and nitrous oxide, and the residential form enables household-scale mitigation measures such as solar generation, rainwater harvesting, tree planting.

The proposal is capable of achieving consistency with Objective CC-O2 through future subdivision design where stormwater management and infrastructure capacity will address climate resilience considerations. The sites are clear of flood hazards. Concentrating residential growth within an existing settlement such as Mangakino is generally more resilient than fragmented rural development patterns, as it enables coordinated infrastructure upgrades, emergency management planning, and more efficient community servicing.

The proposal is generally consistent with Objective CC-O3 because it supports proactive and planned urban growth in an area already identified for future residential expansion within Council's strategic growth planning framework. The proposal also avoids pressure on rural development that can create inefficient infrastructure servicing and increased vulnerability to climate-related hazards. By enabling coordinated residential growth adjacent to existing urban areas, the proposal supports the District's longer-term ability to adapt to climate change effects in a managed and strategic way.

Overall, the proposal delivers an efficient and resilient urban development outcome consistent with the climate change objectives of the District Plan.

7.3.2. Strategic Direction - Fresh Water Quality

Section 6.2 of the Plan contains the strategic Freshwater Quality / Te Mana o Te Wai policy framework. The relevant provisions seek that subdivision and land use is managed in a way that promotes the positive effects, while avoiding, remedying, or mitigating adverse effects (including cumulative effects) of that development, on the mauri, health and well-being of water bodies, to benefit freshwater ecosystems, the wider environment, and the community.

The proposal is consistent with freshwater management objectives, as the proposal will replace existing pastoral farming activities, resulting in a reduction in nutrient inputs to Waikato awa contributing to improved freshwater quality outcomes, consistent with the Waikato Vision and Strategy. The sites are able to be connected to wastewater reticulation. Subdivision design will be meet Waikato Regional Council stormwater guidelines and Taupō Council stormwater requirements incorporating stormwater management measures, including on-site retention and treatment, to ensure contaminants are appropriately managed and potential cumulative contaminant discharge effects are addressed.

Overall, the proposal is capable of enhancing freshwater outcomes, meeting the Waikato Vision and Strategy where a healthy Waikato River sustains abundant life and prosperous communities, maintaining and improving the mauri, health and wellbeing of water bodies and the wider environment.

7.3.3. Strategic Direction - Land Development

Section 6.3 of the Plan contains the strategic land development policy framework. The relevant provisions seek to provide for and manage urban growth (LD-O1) through recognising the appropriateness of Urban Growth Areas as a resource for planned and staged urban growth; and ensuring that any new urban development is predicated by way of Taupō District Development Plan Process and plan change (LD-O2). Any development needs to ensure the maintenance of an

appropriate and sufficient level of infrastructure within existing serviced areas (LD-O3). Any development is to avoid degradation of the Lake and waterways (LD-04), and not detract from the amenity value or qualities of the local environment (LD-O5).

The proposal achieves these provisions by detailed investigations of the sites and their constraints, going through this plan change process, demonstrating demand and sufficient servicing, avoiding degradation of water quality, and not detracting from the amenity value or qualities of the local environment. The sites are identified in the FDS however are not identified as an Urban Growth Area in APP-UGA (these areas were derived from TD2050, now redundant). As the NPS-UD and FDS are the more recent documents these are considered to be of greater guidance and weight. The proposed Development Area and Plan in Appendix 1 has been developed consistent with APP_UGA and other recent Development Areas.

It is considered the proposal achieves the objectives and policies in Section 6.3, with reference to the FDS rather than TD2050.

7.3.4. Strategic Direction - Natural Environment Values

Section 6.5 of the Plan contains the strategic directions for Natural Environment Values. The relevant provisions seek to recognise the importance of the District's natural values and landscapes and their significance to the Taupō District's communities and identity (NEV-O1), protect areas of significant indigenous vegetation (NEV-O2), enhance indigenous biodiversity values (NEV-O3), protect outstanding landscape areas from inappropriate subdivision, land use and development (NEV-O5), recognise the relationship of tangata whenua with the natural values of their ancestral lands, waterbodies, cultural landscapes (NEV-O6), and preserve and enhance the natural character of riparian margins (NEV-O7).

The sites are not identified as an Outstanding Natural Landscape or Significant Natural Area, meaning the proposal avoids direct adverse effects on protected landscapes and indigenous biodiversity, while still maintaining overall landscape character of residential activity adjoining the Waikato River through appropriate dwelling scale and integration with topography and vegetation.

In the subdivision process, indigenous biodiversity values (NEV-O3) may be developed via planting and connection to the lake edge creating ecological value and enhancement of riparian areas (NEV-O7). Appropriate dwelling scale and location can be established in the subdivision process. Largely due to the location of the sites on areas of previous urban use and adjacent to existing urban form, the proposal avoids inappropriate development adjoining Natural Environment values consistent with the intent of the Natural Environment Values objectives.

7.3.5. Strategic Direction - Tangata Whenua

Section 6.6 of the Plan contains the strategic directions for Tangata Whenua. The relevant provision seeks that the values, rights and interests of Taupō District mana whenua are recognised and protected.

The proposal acknowledges the importance of mana whenua relationships with land, water and natural values by avoiding identified culturally significant areas and supporting enhancement of natural systems, thereby aligning with kaitiakitanga and the protection of environmental taonga. WMI is mana whakahaere and has undertaken and will continue engagement with mana whenua consistent with the principles of te Tiriti o Waitangi.

7.3.6. Strategic Direction - Urban Form and Development

Section 6.8 of the Plan contains the strategic directions for urban form and development. The relevant provisions seek that the district develops in a cohesive, compact and structured way (UFD-O1). The effective functioning of rural zones is protected, and the efficient use of zoned and serviced urban land is co-ordinated with the provision of cost-effective infrastructure (UFD-O2). Development of land in appropriate locations which demonstrates social and/or cultural benefits is recognised and provided for (UFD-O3). The development is serviced by an appropriate level of infrastructure (UFD-O4), and is designed to avoid, remedy or mitigate adverse effects on the environment and occurs in a sequenced and coherent manner (UFD-O7).

The proposal achieves these provisions by utilising existing infrastructure where capacity exists or is planned for and being in locations on the edge of Mangakino maintaining cohesive urban form (as viewed from the roads and Lake Maraetai). The assessment of effects concludes adverse effects on the environment will be avoided, remedied or mitigated, particularly avoid significant sites. The proposal will enable wellbeing benefits in that there will be more supply of residential land available for development meeting a clearly demonstrated demand in Mangakino assisting the community and rural industry in the wider area. The possible increase in population will provide for commercial and employment benefits to the wider community also.

It is considered the proposal achieves the objectives and policies in Section 6.8.

7.3.7. Transport

Section 7.3 of the Plan contains the objectives and policies for transport. The safe and efficient operation of the roading network, and movement of traffic, including cyclists and pedestrian within the District is desired (TRAN-O1). Effects on the movement of traffic (including pedestrian flow and parking in Mangakino must also be considered (TRAN-O2).

No traffic assessment has been undertaken. As is known, Mangakino was once a larger community, with a roading pattern and intersections designed for that larger community. As such the roading network and intersections are now more than adequate for the existing population and the proposed additional traffic volume. The existing intersections and road formations are in good condition and have good visibility. As such no wider or Mangakino network issues are likely to occur as a result of additional housing. This matter is applicable to both sites.

Accordingly, the proposal will achieve Objectives and policies in Section 7.3.

7.3.8. Natural Hazards

Section 8.3 of the Plan contains the objectives and policies for natural hazards. The relevant objectives are the protection of activities, development and life from the adverse effects of natural hazards (NH-O1), and activities and development do not create, accelerate, displace or increase the effects of a natural hazard (NH-O2).

The geotechnical assessment concludes that that natural hazard risks are well understood, internal to the site and can be effectively managed through site-specific design. Therefore, the proposal is consistent with this objective and associated policies in Section 8.3.

7.3.9. Operative District Plan Summary

There are a significant number of objectives and policies within the Taupō District Plan relevant to this proposal.

The proposal works towards the climate change outcomes by enabling a development adjoining an existing urban area, improving viability of public transport from Mangakino, reducing agricultural emissions, and thereby reducing the pressure for rural development. Similarly it supports freshwater quality objectives through the reduction of pastoral nutrient inputs, provision of reticulated wastewater, best practice stormwater management, and opportunities for native revegetation in reserves and lake edges.

For land development, the proposal is consistent with Taupō's FDS, and through consideration of WMI's options, the proposal seeks planned and serviced urban growth through the plan change process. This submission notes that the proposal meets Council's criteria for additional land rezoning.

The proposal is consistent with natural environment values objectives by avoiding impacts on significant natural areas and outstanding landscapes while enabling lake edge biodiversity enhancement. It also recognises tangata whenua values through ongoing engagement, and alignment with kaitiakitanga to be exercised by WMI.

Overall this proposal supports urban form and development objectives with rezoning occurring alongside the existing urban area where environmental effects are managed, while achieving transport and natural hazard objectives through safe access and suitability of the land for development.

The proposal is considered to achieve the respective objectives of the Taupō ODP.

7.4. Evaluation of benefits and costs (s32(2)(a))

Benefits	Costs
Economic	
• Supports housing supply and responds to identified demand for Mangakino residential land. • Generates economic activity through land development and construction, and rates • More efficient use of existing infrastructure networks including public transport • More efficient use of wider services – medical, education • Supports local economy	• Development costs including infrastructure upgrades, though these are minimal • Loss of some marginal farming land (albeit small parcels) and associated reduction in farming outputs
Social	
• Increased housing choice and availability for the community • Supports community growth and wellbeing • Supports viability of services within Mangakino including shopping centre, Council service centre, school and public transport	• Change in local amenity experienced by neighbouring residents
Cultural	
• Opportunity to incorporate kaitiakitanga through ecological enhancement and land management • Development occurs on land with no identified sites of significance	• Potential effects on unidentified cultural values
Environmental	
• Consolidation of development adjacent to existing urban areas, reducing pressure for dispersed rural subdivision • Opportunities to enhance indigenous biodiversity through native planting, ecological restoration • Reduction in agricultural greenhouse gas emissions (methane and nitrous oxide) through the conversion of pastoral farming to residential use • Decrease in nutrient inputs to Waikato Awa, contributing to improved freshwater quality	• Potential edge effects on adjacent ecological areas (eg weeds, domestic animals) • Increased impervious surfaces • Continued reliance on private vehicle relative to higher density environments. • Loss of rural character and open landscape values.

7.5. Economic Growth and Employment Opportunities (s32(2)(a)(i) & (ii))

The proposed rezoning of approximately 17ha of rural land to residential zoning in Mangakino will provide for a modest but sustained level of growth, enabling approximately 7–10 residential lots per year. This scale of development is consistent with the strategic growth anticipated by Taupō District Council's Future Development Strategy and will contribute positively to the economic and social wellbeing of Mangakino and the wider western Taupō District.

The proposal will generate direct economic benefits through:

- subdivision and civil construction activity,
- housing construction,
- infrastructure installation,
- surveying, engineering, planning, and related professional services,
- and ongoing property investment.

The staged release of residential lots over time will support a steady pipeline of work for local contractors, builders, tradespeople, and service providers, rather than creating short-term boom-and-bust development pressures.

Based on Formative's Assessment approximately half the dwellings will be permanent residents. Additional residential growth in Mangakino will also help support the viability of existing local businesses, community services, schools, and recreational facilities by increasing the permanent resident population and broadening the local rating base. Increased population can improve demand for retail, hospitality, maintenance, health, and community services, supporting local employment opportunities and economic resilience.

The proposal may also assist in addressing housing supply constraints within Mangakino by providing additional residential development opportunities in a planned and serviced location. Increased housing availability can support workforce retention and attraction within the wider district, including workers associated with tourism, forestry, agriculture, construction, and local service industries. Importantly, the scale of growth proposed is moderate and proportionate to Mangakino's anticipated future growth trajectory. The development is therefore unlikely to generate significant adverse infrastructure or labour market pressures, while still contributing positively to local economic activity and long-term settlement sustainability.

Overall, the rezoning will support:

- incremental and sustainable economic growth,
- ongoing employment opportunities during development and construction,
- increased housing supply and investment,
- improved community resilience,
- and the long-term vitality of Mangakino as a rural township within the Taupō District.

7.6. The risk of acting or not acting if there is uncertain or insufficient information (s32(2)(c))

There is no uncertain information or insufficient information about this proposal, therefore an assessment of risk of acting or not acting is not considered necessary.

However it is noted that not acting would fail to implement Taupō's FDS and Housing Strategy, failing to provide a competitive housing market where needed allowing Mangakino's rent and housing prices to increase, resulting in negative effects on community wellbeing.

7.7. The efficiency and effectiveness of provisions (s32(1)(b)(ii))

7.7.1. Efficiency

The rezoning of the Mangakino sites to Residential is considered efficient for the following reasons:

- **Efficient use of land and infrastructure:** The sites adjoins existing Mangakino urban area. The sites are in close proximity to established infrastructure networks where there is either sufficient capacity or planned capacity. This avoids the need for new, standalone infrastructure systems and reducing overall capital and environmental costs to the wider community.
- **Avoidance of inefficient development patterns:** Rezoning enables a planned and coordinated urban expansion, avoiding fragmented and ad hoc rural subdivision that would otherwise occur through the resource consent process, which is typically less efficient and results in poorer outcomes.
- **Benefits to Environment:** The transition from pastoral farming reduces greenhouse gas emissions and nutrient inputs to the Waikato Awa, creating environmental gains at a relatively low cost when compared with continued rural land use.
- **Economic outcomes:** Economic gains will result from the conversion of low value dry stock grazing land to residential dwellings, resulting in economic expenditure relating to land development, infrastructure upgrades, contractor employment, and housing construction. The increase population (permanent or visitor) will result in increased spending in the community to the benefit of businesses and services.
- **Alignment with infrastructure funding mechanisms:** Development contributions ensure that growth pays for growth, minimising fiscal burden on the wider community.

While there are costs associated with the loss of rural land, infrastructure upgrades, and potential environmental effects, these are moderate, well understood, and able to be internalised by the developer or mitigated through design and consenting mechanisms.

7.7.2. Effectiveness

The proposal is considered highly effective for the following reasons:

- **Directly addresses housing supply issues:** The proposal provides substantial residential capacity for Mangakino (approximately 180 lots) to meet the longterm supply for this township. The sites are immediately adjacently to the township and will support its growth. This capacity will meet a demonstrated demand, provide flexibility in housing typologies and contribute modern housing for permanent and visitor population, supporting a well-functioning urban environment.

- Delivers planned urban growth: The proposal provides a structured and coordinated framework for development through the District Plan as required by the FDS, rather than relying on less certain and less integrated consent-based development pathways.
- Strong alignment with strategic objectives: The proposal achieves climate change, freshwater, infrastructure, urban form, and natural environment objectives by enabling development in an appropriate location with manageable effects.
- Effectively manages environmental effects: The scale and nature of effects are well understood and can be avoided, remedied or mitigated through subdivision design, consent conditions, and best practice environmental management.
- Supports resilient and adaptive development: The low-density format enables site-specific responses to natural hazards, climate change, and future adaptability, increasing the long-term effectiveness of the development.
- Provides certainty and clarity: Rezoning provides a clear planning framework for landowners, Council and infrastructure providers, improving certainty and enabling better long-term planning outcomes.

7.8. Options Considered (s32(1)(b)(i))

Option 1: Status Quo The existing Rural Zone and related provisions applying to the sites would be retained and non-complying consent would be required.	Continuing to apply Rural Zone provisions to the identified areas of land will not assist in achieving the ODP's objectives relating to ensuring sufficient residential development capacity and providing for sustainable growth. Any consent would be high risk, with uncertainty as residential development in rural zones is not supported by the objectives and policies. Consequence could be increased demand for infill housing however this is a style of housing with more limited appeal.
Option 2: Rezoning the sites as General Residential without the development area plan	This option would not provide a coordinated and integrated framework for development. The development area plan addresses connectivity, connectivity needs, and site specific natural hazards. The development area plan allows environmental constraints to be identified and appropriately managed upfront.
Option 3: Lodge a private plan change request to rezone the sites General Residential with a development area plan.	This option was seriously considered, however would be inefficient when the Council has already notified Plan Change 44, and would be much more costly for the applicant. The same outcomes would be achieved as per this submission for this proposal.
Option 4: Rezone the sites as Low Density Residential	Zoning the sites low density residential may not require sewer reticulation or WWTP upgrade, reducing costs for development. However this zoning would be an inefficient use of serviceable land.
Option 5: Rezone alternative sites – Taniwha Street	This option was seriously considered. Taniwha Street was similarly developed with housing in 1950s and is also in close proximity to roading and waters infrastructure. These attributes are not materially different to the current proposal and so do not provide a rational basis for choosing to rezone Taniwha Street instead of the proposed sites. Furthermore, the Taniwha Street land is also part of a larger dairy farm unit efficiently farmed and has potentially greater impacts on adjoining landowners views.

7.9. Reason for Option Chosen (s32(1)(b)(iii))

This submission on Council's Proposed Plan Change 44 to rezone 35 Lake Road and 3 Karamū Street to General Residential, supported by a development plan, is the most appropriate option because it utilises an existing and commenced statutory process specifically designed to consider residential zoning changes, ensuring timely and efficient decision-making without the need for a standalone private plan change.

As per Council's Section 32 evaluation, this submission reduces duplication of process, cost, and delay. Incorporating a development plan within this submission further strengthens the proposal by demonstrating comprehensive and coordinated planning, including how infrastructure, access, and environmental constraints will be managed.

Together, this approach provides a balanced and efficient pathway that achieves the benefits of integrated development planning while leveraging the broader strategic and policy framework already being progressed through PC44, making it a practical, effective and cost-efficient method of securing rezoning outcomes.

8. ASSESSMENT OF ENVIRONMENTAL EFFECTS

This submission outlines WMI's request to rezone two sites from General Rural to General Residential. WMI have undertaken their own assessment of potentially suitable sites for residential zoning. Although not limited to these sites, WMI's assessment identified two sites as suitable options for residential zoning, when assessed against residential housing criteria. These two sites are being 37 Lake Road and 3 Karamū Street in Mangakino.

Detailed reporting has been undertaken on both these sites including Economic, Ecological, Visual Landscape, Cultural, Geotechnical, Transportation, Infrastructure, Soil Contamination, and Land Classification to determine whether there are any significant constraints to the sites being developed for residential use or effects associated with the conversion to residential house.

This submission provides supportive investigations in summary form to address the matters outlined in Taupō District Plan APP-UGA as required for rezoning of land to residential. Full assessments are available in Appendices 3 to 8.

8.1. Economic Effects

WMI engaged Formative Limited to provide an economics assessment of the predicted growth in supply and demand in Mangakino (Appendix 7). This assessment also assesses the benefits of a diverse housing market where greenfield and infill housing is offered.

The assessment concludes that sustained growth is anticipated with demand from both local and temporary residents expected over the next 30 years, suggesting there would be combined demand in the range of 255 to 362 new dwellings by 2053. This suggests that there is demand for around 7 to 10 residential lots per annum. This assessment informed the scale of this proposal, informing the decision to not pursue Option 5 (Taniwha Street - as noted in Section 7.8) at this time.

For rentals, around 38% of permanent residents in Mangakino live in a rental dwelling and Median rents in the Mangakino area have increased from just under \$400 per week in 2016 to \$685 per week in 2025. Overall Residential sales prices and weekly rents in Mangakino have both increased considerably since 2016, which means that the housing affordability has deteriorated in the town.

Given the expected growth trajectory and the relatively limited remaining supply in Mangakino, it is likely that both 57 Lake Road and Karamū Street will need to be brought forward for development. At a projected growth rate of approximately 7-10 dwellings per annum and an estimated remaining capacity of around 25 lots, existing capacity would be exhausted within the next 2–3 years.

This indicates a potential shortfall emerging in the short term, likely around 2028-2029. On that basis, there appears to be a clear need for additional zoned land to ensure supply remains aligned with demand. Accordingly, rezoning via PC44 of at least 57 Lake Road should be progressed now as a minimum response to address the anticipated capacity constraint. We also consider that rezoning Karamū Street would be beneficial, as it would help ensure an adequate supply of residential capacity and provide additional flexibility to respond to demand.

(page 25 Formative Report)

The addendum to the report provides advice on the split of demand between greenfield capacity (i.e. standalone dwellings in new urban areas) and intensification capacity (i.e. attached dwellings in existing urban areas), with a particular focus on Mangakino to address the requirements of Clause 3.2 of NPS-UD. The capacity assessment (under Clause 3.2) consider capacity in terms of a set of criteria – “plan enabled”, “infrastructure-ready”, and “feasible and reasonably expected to be realised”, as well as the . The recommendations are that

Given the available data, it is likely that there is limited Plan Enabled capacity in Mangakino and that much of this capacity may not be developable. While there may be some infill potential there has been no assessment of whether this development could be reasonably expected to be realised or whether it would be commercially feasible to do so.

For Mangakino the council could consider adopting a 100:20 split policy which would be consistent with the NPS-UD competitiveness margin. This 100:20 split, would provide for 100% of demand in new greenfield development and 20% within existing urban areas.

This would mean planning for 255 to 3562 additional dwellings by 2053 in new urban areas and 50 to 70 additional dwellings by 2053 in the existing urban areas.

(page 30 & 31, Formative Report)

In conclusion, there are potential adverse effects of not rezoning additional land to Residential, whereby insufficient housing capacity would occur further decreasing affordability in Mangakino.

Wider economic effects of additional housing and a resulting increase in permanent and holiday house population are increased spend at local businesses, decreased costs associated with travel for rural industry workers, construction income and increased efficiency public transport.

8.2. Ecological Effects

Lake Road

Lake Road is largely in pasture with a recently cleared area returned to pasture from blackberry. A small portion of the site (the northern embankment) has some mid quality native bush. Due to the slope this embankment is undevelopable as identified in the geotechnical report. Therefore this bush could be retained via covenant or other protection. Due to the significant area of pasture and the inability to develop this area, no detailed ecological assessment is considered warranted.

Karamū Street

Karamū Street is similarly in pasture. According no ecological assessment has been undertaken as there are considered no effects on floral and fauna at these sites. A positive benefit of the proposal for Lake Road is the likely provision of stormwater reserves with pedestrian access, where native revegetation will likely occur. Therefore a positive benefit is the likely increase in biodiversity from future native revegetation and general residential property landscaping. Consideration of possible future native revegetation is provided for in the Development Plan Key Outcomes DEV8.2 (Appendix 1) and in current assessment criteria to which subdivision applications will be subject to (SUB-R14.f & i).

8.3. Landscape and Visual Effects

WMI engaged Narrative Landscape Limited to provide a landscape and visual assessment of the two sites (Appendix 3), with Lake Road directly adjoining Lake Maraetai/Waikato Awa (OLA56).

Lake Road

Given significant modifications to the area, the main landscape issues are considered to be;

- *Potential adverse landscape and visual amenity effects on nearby residential properties; and*
- *Ensuring that the treatment of perimeter development appropriately integrates with the receiving environment (be that neighbouring residential properties, roads, escarpments or the lake/river edge).*

(page 28, Narrative Report)

The Conclusions of the LVA are:

Based on the above assessment of landscape and visual amenity effects, it is considered that the two proposed WMI rezoning sites would be capable of accommodating a Residential Environment zoning.

The rezoning itself won't cause an adverse landscape effect. However, to ensure future development is well integrated into the receiving environment, it is recommended that an Outline Development Plan is prepared for the WMI Lake site.

A significant contributing factor, which has diminished potential adverse landscape and visual amenity effects, is the historical context relating to the Pouākani Block and Mangakino Hydroelectric Dam Village. With both of the sites having previously held an urban landuse.

It has been concluded that the level of landscape and visual amenity effect, as a result of rezoning to General Residential Zone, does not exceed a Low-Moderate adverse effect (Minor) for the Lake Rd site, or exceed a Low adverse effect (less than minor) for the Karamū St site.

(page 29, Narrative Report)

Narrative's report has made recommendations for measures to be incorporated into the Outline Development Plan for consideration in subdivision design. These and the recommended Height Overlay are incorporated into the Development Plan Key Outcomes DEV8.2 (Appendix 1).

Karamū Street

Narrative's assessment does not recommend any particular landscape measures for Karamū Street.

8.4. Effects on Cultural & Archaeological Values

An interview has been held with Craig Ahipene, Eli Paerata and Timutetai Paerata, kaumatua for Ngāti Te Kohera. No cultural sites of significance or areas of historical occupation have been identified on the lands in question in this interview (Appendix 10).

No archaeological sites have been identified on NZAA Arch Site on these lands either. This assessment relates to both blocks. Consultation with Raukawa and Ngāti Tūwharetoa raised no concerns about sites of significance. It is possible that the damming of Waikato River by Maraetai Dam to form Lake Maraetai flooded sites of significance which are likely to have been in closer proximity to historical location of the river.



Image 9 – Extract from NZAA Arch site mapping

8.5. Geotechnical Effects

WMI have commissioned CMA Geosciences to undertake geotechnical assessment for both sites (Appendix 5).

Lake Road

CMW Geoscience undertook a geotechnical investigation of Lake Road including onsite testing of Lake Road. Due to its topography (sloping with steep northern embankment) and its previous use for timber mill with sawdust disposal, this report identifies the following constraints:

- Slope Stability Hazard zones for specific assessment and appropriate setbacks
- Cut/Fill Batter gradients for this location
- Excavation of uncontrolled fill or Specific Engineer Design pile foundations
- Void management for foundation design
- Bulk earthworks will be needed to create engineered fill
- Onsite soakage is not recommended for sites close to steep natural slopes and cut batters
- A range of other stormwater methodologies are also recommended

Section 8 of the Lake Road report outlines further work to advance development plans and resource consent application. These measures are normal practice in land development, and have been incorporated into the Development Plan Key Outcomes DEV8.2. With the slope stability hazard zone and historic sawdust stockpile identified clearly as a Natural Hazard Zone in the Development Plan and associated requirements detailed, the development of the site is possible with a clear rule framework to provide assessment of geotechnical recommendations in a subdivision consent. With measures incorporated, the Natural Hazard Risk for this site is deemed to be low.

Karamū Street

CMW Geoscience undertook a desktop preliminary geotechnical assessment of 3 Karamū Street. Due to its topography (flat) and lack of steep slopes or fault lines, and its previous use for housing, the main geotechnical considerations are erosion cavity features (voids/tomos) and unsuitable fill. Standard subdivision investigations and construction measures are anticipated to be suitable.

Section 8 of the Karamū Street report outlines further work to advance development plans and resource consent application. These measures are normal practice in land development. With measures incorporated, the Natural Hazard Risk for this site is deemed to be low. Consequently, no Natural Hazard Overlay is proposed for this site, rather the existing assessment criteria in SUB-R2 and SUB-R14 are considered sufficient to address earthworks and geotechnical matters at time of subdivision.

8.6. Transportation Effects

As is known, Mangakino was once a larger community, with a roading pattern and intersections designed for that larger community. As such the roading network and intersections are now more than adequate for the existing population and any addition of housing on land previously used for housing. As such no wider or Mangakino network issues are likely to occur as a result of additional housing. Adequacy of the road formations can be provided in an engineering assessment along with current traffic counts to confirm adequacy. Additionally consultation can occur with NZTA/Waka Kotahi to confirm if required. This matter is applicable to both sites. Detailed assessment of this matter is provided for in existing assessment criteria in SUB-R2.a and SUB-R14.I & n.

Mangakino is a small community, readily bikeable and walkable. Its isolation from other communities and the distances to get to community and health services and workplaces is problematic. Current public transport is currently the C2T Tokoroa to Taupō Bus, travelling between Tokoroa, Mangakino, Whakamaru and Taupō – in both directions, on Tuesday and Friday. Public transport will be more viable with an increase in population in Mangakino, which this rezoning may achieve.

8.7. Infrastructure Effects

WMI engaged Cheal Consultants Limited to provide a civil engineering assessment of both sites (Appendix 6).

Overall Capacity

Council engineers confirm that there is sufficient water capacity in Council water take consent for at least 200 additional lots in Mangakino over current peak demand. Any specific network upgrade or extension would be required as part of any subdivision.

Over the last four years, discussions have been undertaken with Council's wastewater asset manager. These discussions have led to the inclusion in Taupō Council's Long Term Plan 2024 of an expanded Mangakino WWTP to cater to expected growth in Mangakino being at least 180 dwellings of greenfield and some infill housing also. The Mangakino Wastewater Treatment Plant is in the process of being re-consented by Waikato Regional Council. This re-consenting will include the additional discharge volume necessary for this proposal. Although delayed by recent changes in both the extension to the expiry date of the expired consent to 31 December 2027, and the new Wastewater Environmental Performance Standards, the Taupō's Long Term Plan 2024 continues to include funding for this upgrade which will occur in sufficient time for connection by the proposed sites, at the 7-10 lot rate of development.

Any roading stormwater must be retained on-site which can be incorporated into any subdivision design whereby stormwater management methodologies will be consistent with Taupō Code of Practice and Waikato Regional Plan. The findings of the geotechnical report on this matter are also relevant.

No upgrade to existing intersections are needed. New intersections will be to Lake Road where there is excellent visibility. Connections to walking and cycling trails are able to be made.

Lake Road

Due to fall to the existing wastewater main, a small portion of the site (northeastern boundary) will require onsite wastewater pumps to access the wastewater network. Any specific network upgrade or extension would be required as part of any subdivision.

Karamū Street

Karamū Street may require a wastewater pump due to shallow fall to existing wastewater infrastructure. Stormwater may be required to be retained on site. These constraints are normal development considerations for residential housing.

The conclusion of the Engineering Assessment is:

Based upon the above review and commentary, services and access to both sites can be generally accommodated within existing networks, considering the surrounding residential environment with the Town Centre Environment a few blocks away. Final stormwater disposal may vary once more specific geotechnical assessments have been completed as some of Lake Road and potentially all of Karamū Street may allow for soakage.

Currently Taupō District Council is applying to the Waikato Regional Council for a Consent to upgrade both Wastewater Treatment Plants. Provision to service these two sites was confirmed within the proposed upgrade. Significant Developers contribution fees towards upgrade and enhancement of the water quality to the Lake and Town Supply are a mutual benefit to Mangakino Township, TDC and Developer.
(page 30, Cheal Report)

Detailed assessment of infrastructure provision and design is provided for in existing assessment criteria in SUB-R2.a & c and SUB-R14.d & l.

8.8. Land Contamination Effects

WMI have commissioned Geohazards Environmental Limited to undertake both a Preliminary Site Investigation (PSI) and a Detailed Site Investigation (DSI) for both sites (Appendix 4).

Lake Road

As detailed in Section 5.8.1 of this report, Lake Road is the former site of the Mangakino Timber Mill. DSI testing identifies a contamination area where a variety of contaminants (lead, zinc, copper and asbestos) exceed the SCS and Eco EGV requirements for residential use. Of note all results are within SCS guidelines for commercial use. A remediation action plan is recommended for residential use at the time of subdivision, with further assessment to be undertaken in 13 of the 25 sample locations.



Image 10 – Extent of Soil Contamination

Karamū Street

As also identified in Section 5.8.1, a DSI was also undertaken on Karamū Street with 30 samples taken. The report states that no remediation is required on this site.

Detailed assessment of contaminated sites is provided for in existing assessment criteria in SUB-R2.b and SUB-R14.e, and via the requirements of the National Environmental Standard for Soil Contamination as outlined in Section 5.8.

9. ENGAGEMENT

Consultation has been undertaken with a variety of stakeholders over the last 3-4 years as detailed in the Consultation Summary (Appendix 9).

Consultation was undertaken in 3 rezoning options being Lake Road, Karamū Street and Taniwha Street. Taniwha Street was an site under consideration by WMI, being a portion of the land between Taniwha Street and Mangakino Golf Course on the eastern side of Mangakino. Although previously housing in 1950s, following feedback from adjoining owners, this option was not progressed at this time.

Consultation has been undertaken with Pouakani Trust, Tūwharetoa Māori Trust Board and Raukawa. Specifically a hui was held with Pouakani Marae Kaumatua Craig Ahipene, Eli Paerata, Timu Paerata and WMI representative Michael Allan on 13 October 2023. This hui discussed the cultural assessment of Mangakino and WMI lands.

Group	Outcome
• Pouakani Marae	Letter of Support
• Tūwharetoa Maori Trust Board	Ok with engagement with mana whenua Pouakani Marae
• Raukawa Charitable Trust	Positive feedback at meeting, Guidance on soil contamination protocols provided.
• Waikato Regional Council	Discussion held with LUC team
• Mercury Energy	No feedback sought, due to location above river level
• Council Asset Managers	No concerns regarding water capacity Additional wastewater capacity planned for
• Waka Kotahi	No feedback sought, due to location of sites being on local roads.
• Adjoining Landowners	No direct consultation however some owners attended the public hui
• Wider community/interest groups	Hui held at Pouakani Marae, minutes taken Most feedback was from WMI Shareholders. Some neighbours at Taniwha street opposed development there. Few comments on Lake Road or Karamū Street. River Trails in support